



SDMS DocID 2008166

CERRO METAL PRODUCTS CO.



BELLEFONTE WORKS
P O BOX 388
BELLEFONTE, PA 16823

March 26, 1993

U.S. Environmental Protection Agency
Region III
841 Chestnut Building
55 East 111th Street
Philadelphia, PA 19107

Attention: Alex Speicher, Technical Assistant Team
FAX: (609) 461-4916 **TELEPHONE:** (609) 461-4003

Reference: EPA Assessment Sampling Plan

Subject: Comments Pertaining to your DRAFT Plan

Dear Mr. Speicher:

Mr. Arway has never been in a meeting with PADER and CMPCo to discuss any of the plans or actions that have taken place. Active communications, submission of work plans, quality assurance plans and programs, etc. have been underway with PADER and the Pennsylvania Fish Commission and are continuing with positive results. I don't understand Mr. Arway's role or purpose outside of these efforts.

Second paragraph of 'B' (Background), alleges spills of nitrates and most certainly spills of PCB's. The EPA TSCA section is basically responding to two inspections made in 1990 and early 1992 regarding inspection records of PCB filled transformers prior to 1985 and to storage facility violation of continuous curbing. We are actively resolving these issues.


With regard to paragraph 'D' (Scope), we question the need for 30 wipe samples from the information currently available and to be gathered with implementation of the work plan submitted to PADER. It is unclear what the objective is by performing wipe samples from the operating buildings. The detailed historical review recently developed is more effective. We believe wipe samples inside the buildings will be inconclusive and should be eliminated from the sampling plan.

AR100012

Mr. Alex Speicher
March 26, 1993
Page Two

In that the FAX you sent is marked DRAFT, we presume you will finalize this plan and send it to us before you come to the plant. If you would like to discuss the voluntary efforts we are making with the various regulatory agencies please let us know. We are a concerned, environmentally conscious company.

Sincerely,


J.P. Hendrick
Vice President
Maintenance & Engineering

JPH/slh

AR100013